

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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EMÖKE BEICKERT AND STEPHANIE KUSHNER,

Plaintiffs,

No. 22-CV-05265 (DLI)(VMS)

-against-

NEW YORK CITY DEPARTMENT OF EDUCATION,

Defendant.

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PLEASE TAKE NOTICE, that upon the accompanying Declaration of Assistant Corporation Counsel Joseph B. Reynolds, dated December 5, 2022, and the exhibits annexed thereto, the Memorandum of Law in Support of Defendant's Motion to Dismiss the Complaint as to Stephanie Kushner, dated December 5, 2022, and upon all prior pleadings and proceedings held herein, Defendant New York City Department of Education will move this Court before the Honorable Dora L. Irizarry, United States District Judge at the United States District Court for the Eastern District of New York, at the United States Courthouse located at 225 Cadman Plaza East, Brooklyn, New York, at a date and time to be determined by the Court, for judgment in favor of Defendant pursuant to Rule 12(b) of the Federal Rules of Civil Procedure dismissing the Complaint with respect to the claim brought by Plaintiff, Stephanie Kushner, in its entirety, and for such other and further relief as the Court may deem just and proper.

Dated: New York, New York
December 5, 2022

HON. SYLVIA O. HINDS-RADIX

Corporation Counsel of the
City of New York
Attorney for Defendant
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By: /s/ Joseph Reynolds
Joseph B. Reynolds
Assistant Corporation Counsel

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

EMÖKE BEICKERT and STEPHANIE KUSHNER,

Plaintiffs,

-against-

NEW YORK CITY DEPARTMENT OF EDUCATION,

Defendant.

**NOTICE OF DEFENDANT'S MOTION TO
DISMISS THE COMPLAINT AS TO
STEPHANIE KUSHNER AND
DECLARATION OF JOSEPH B. REYNOLDS
IN SUPPORT**

HON. SYLVIA O. HINDS-RADIX

Corporation Counsel of the City of New York

Attorney for Defendant

100 Church Street, Second Floor

New York, New York 10007

Joseph B. Reynolds

Tel: (212) 356-2442

Matter No.: 2022-056278

Due and timely service is hereby admitted.

New York, N.Y., 2022_

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Attorney for